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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

JENNIFER TILDEN,

Plaintiff,

v.

C. R. BARD, INC.; BARD PERIPHERAL
VASCULAR, INCORPORATED,

Defendants.

CASE NO. 2:19-cv-01571-KJD-DJA

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND STAY OF
DISCOVERY AND ALL PRETRIAL
DEADLINES**

(SECOND REQUEST)

The Parties, Plaintiff Jennifer Tilden (“Plaintiff”) and Defendants C. R. Bard, Inc. and Bard Peripheral Vascular, Inc. (“Bard”), respectfully request pursuant to Fed. R. Civ. P. 26(c)

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1 and (d) that this Court continue the stay of discovery and all pretrial deadlines in this case
2 until February 15, 2020 while they pursue on-going settlement discussions. In support
3 thereof, the Parties state as follows:

4 1. Counsel for Plaintiff Tilden and Defendants Bard have been engaged in
5 good faith settlement discussions on this case since the Court granted the Parties'
6 initial request to stay discovery.

7 2. To date, Plaintiff has provided Defendants with all medical records
8 regarding this matter. Defendants have reviewed the medical records and posed
9 questions to the Plaintiff regarding such records.

10 3. Plaintiff and Defendants have had several communications regarding
11 resolution of issues and are continuing to narrow the issues in order to reach
12 settlement.

13 4. Thus, the Parties jointly move this Court for an order staying the case
14 until February 15, 2020 to allow the Parties to continue to engage in settlement
15 discussions. This will further facilitate settlement discussions and prevent
16 unnecessary expenditures of the Parties' and judicial resources.

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5. The Parties agree that the relief sought herein is necessary to handle the case in the most economical fashion, yet allow sufficient time to schedule and complete discovery if necessary, consistent with the scheduling obligations of counsel. The relief sought in this motion is not purely for delay, but so that justice may be done. Respectfully submitted this 15th day of November 2019.

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Attorneys for Defendants

Attorneys for Plaintiff

IT IS SO ORDERED:



12/5/2019
DATED: _____

UNITED STATES MAGISTRATE JUDGE

CERTIFICATE OF SERVICE

I hereby certify that on **November 15, 2019**, I caused the foregoing document to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the CM/ECF participants registered to receive such service.

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